

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
KEISHA K. MATTHEWS  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Keisha\_Matthews@fd.org

6 Attorney for Daniel Lee Rhees  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 DANIEL LEE RHEES,  
15 Defendant.

Case No. 2:23-cr-00017-APG-NJK  
**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(Second Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Keisha K.  
20 Matthews, Assistant Federal Public Defender, counsel for Daniel Lee Rhees, that the  
21 Preliminary Hearing currently scheduled on April 26, 2023, be vacated and continued to a date  
22 and time convenient to the Court, but no sooner than May 4, 2023.

23 This Stipulation is entered into for the following reasons:

- 24 1. The Waiver of Indictment/Filing of an Information/Arraignment and Plea  
25 Hearing is currently scheduled for May 3, 2023 in this case.  
26

2. Parties have reached a non-trial resolution and need additional time to resolve this matter.

3. Defendant is in custody and does not object to a continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation is excludable in computing the time within which the defendant must be indicted, and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

This is the second request for continuance filed herein.

DATED this 25th day of April, 2023.

RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

*/s/ Keisha K. Matthews*  
By \_\_\_\_\_

*/s/ Bianca R. Pucci*  
By \_\_\_\_\_

KEISHA K. MATTHEWS  
Assistant Federal Public Defender

BIANCA R. PUCCI  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 DANIEL LEE RHEES,

7 Defendant.  
8

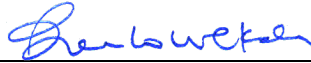
Case No. 2:23-cr-00017-APG-NJK

**ORDER**

9  
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12 April 26, 2023, at the hour of 3:00 p.m., be vacated and continued to **May 9, 2023 at 3:00 p.m.**  
13

14 DATED this 26th day of April, 2023.

15  
16 

17 UNITED STATES MAGISTRATE JUDGE  
18  
19  
20  
21  
22  
23  
24  
25  
26